4.15 ENVIRONMENTAL JUSTICE

This section analyzes the distributional patterns of high-minority and low-income populations on a regional basis and characterizes the distribution of such populations adjacent to the proposed Project and the Alternatives. This analysis focuses on whether the proposed Project's impacts have the potential to adversely and disproportionately affect minority populations, low-income communities, and industries, thus creating an adverse environmental justice impact.

This section relies on economic and population data from the U.S. Census Bureau, and incorporates by reference the conclusions of the EMT EIR and summarizes these conclusions where applicable. Where this document uses MMs contained in the EMT EIR, the measures are summarized to permit comprehension of their relationship to the proposed Project. This document also incorporates data from Santa Barbara County 01-ND-34 and City of Goleta 06-MND-01.

4.15.1 Background

On February 11, 1994, President Clinton issued an "Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" designed to focus attention on environmental and human health conditions in areas of high minority populations and low-income communities, and promote non-discrimination in programs and projects substantially affecting human health and the environment (White House 1994). The order requires Federal agencies (as well as State agencies receiving Federal funds) to identify and address any disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and/or low-income populations.

CSLC Policy

The CSLC has developed and adopted an Environmental Justice Policy to ensure equity and fairness in its own processes and procedures. The CSLC adopted and amended the Environmental Justice Policy on October 1, 2002, to ensure consideration of environmental justice as part of CSLC processes, decisions and programs. The policy stresses equitable treatment of all members of the public and commits to consider environmental justice in its processes, decision-making, and regulatory affairs. It is implemented, in part, through identification of, and communication with, relevant populations that could be adversely and disproportionately impacted by CSLC projects or programs, and by ensuring that a range of reasonable alternatives is identified that

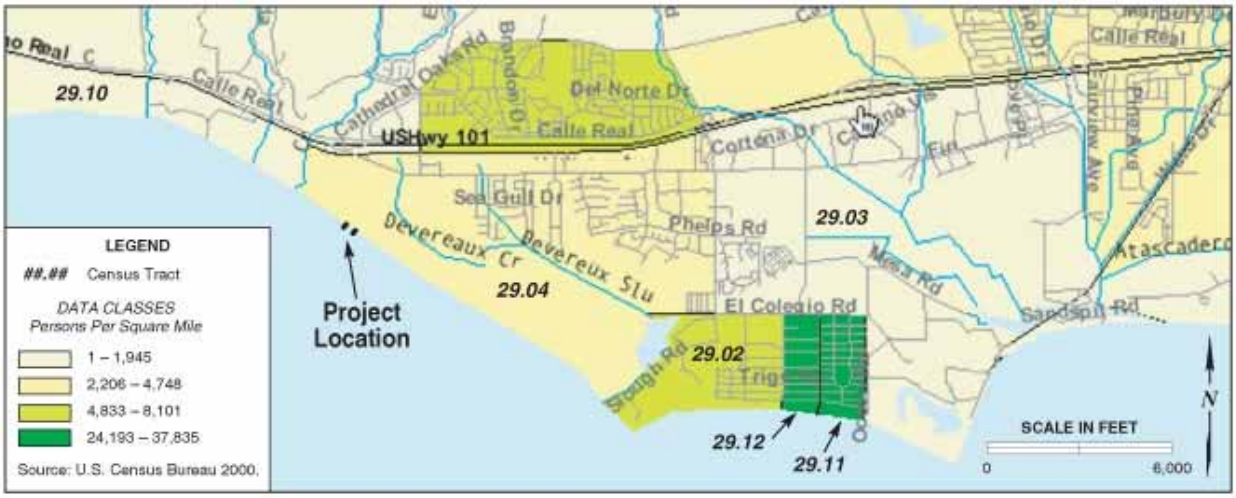
would minimize or eliminate environmental impacts affecting such populations. This discussion is provided in this document consistent with and in furtherance of the CSLC's Environmental Justice Policy. The staff of the CSLC is required to report back to the Commission on how environmental justice is integrated into its programs, processes, and activities (CSLC 2002).

4.15.2 Environmental Setting

Project Study Area and Communities of Comparison

According to U.S. EPA guidance, a minority or low-income community is disparately affected when the community would bear a disproportionate level of health and environmental effects when compared to the general population. Further, the guidelines recommend that the Communities of Comparison selected be the smallest governmental unit that encompasses the impact footprint for each resource. PRC 421 is located on State tide and submerged lands adjacent to the city of Goleta, in Santa Barbara County. Therefore, for the purposes of this environmental justice assessment, the Project study area includes the northern portion of the city of Goleta, south of Highway 101, west of Fairview Avenue, and east of the Bacara Resort. This area includes census tracts 29.02, 29.03, 29.04, 29.10, 29.11, and 29.12 (Figure 4.15.1). The census tracts are further broken down into a total of 20 block groups. U.S. Census data from 2000 for these census tracts and block groups were used to characterize the Project study area for this analysis.

FIGURE 4.15-1. CENSUS TRACTS IN THE VICINITY OF THE PROPOSED PROJECT



Study Area Demographics

In 2000, the population of the city of Goleta was 55,204 and the population of Santa Barbara County was 399,347. The total population of all census tracts within the study area was 28,950 (U.S. Census Bureau 2000). Within the study area census tracts, minorities comprised 28.9 percent of the population in 2000, compared to 21.4 percent in the city of Goleta and 27.3 percent in Santa Barbara County (see Table 4.15-1). Asians comprised the largest minority group within the study area (10.8 percent), while Pacific Islander and Native American groups comprised the smallest percentage of the population (0.9 percent). Further, Hispanic or Latino write-in respondents could potentially be categorized under any of the classification groups designated by the U.S. Census Bureau, including "other," in addition to the Hispanic classification. Hispanic is considered an origin, not a race, by the U.S. Census Bureau. An origin can be viewed as the heritage, nationality group, lineage, or country of birth of the person or the person's parents or ancestors before their arrival in the United States. Therefore, people who identify their origin as Spanish, Hispanic, or Latino may be of any race. Within the study area, Hispanic/Latino write-in respondents comprised 20.7 percent of the population.

Table 4.15-1. 2000 Ethnicity Data for the City of Goleta and Santa Barbara County

	Study Area		Goleta		Santa Barbara County	
	Population	**Percentage**	**Population**	**Percentage**	**Population**	**Percentage**
White	20,576	71.1	43,397	78.6	290,418	72.7
Minority	*8,374*	*28.9*	*11,807*	*21.4*	*109,022*	*27.3*
Black	627	2.2	703	1.3	9,195	2.3
Asian	3,134	10.8	3,548	6.4	16,344	4.1
Pacific Islander	56	0.2	60	0.1	799	0.2
Native American	205	0.7	451	0.8	4,792	1.2
Other	2,404	8.3	5,098	9.2	60,701	15.2
Two or More	1,530	5.3	1,947	3.5	17,172	4.3
Hispanic*	5,995	20.7	12,326	22.3	136,577	34.2

*May be counted in one or more of the other categories as well.

Source: U.S. Census Bureau 2000.

Census data were also analyzed to determine poverty status in the study area. As displayed in Table 4.15-2, approximately 45 percent of the individuals residing within the study area had income levels below the poverty level in 1999. In contrast, 7 percent of Goleta residents and 14 percent of Santa Barbara County residents had income levels

Table 4.15-2. Poverty Status in 1999

	Project Study Area	Goleta	Santa Barbara County
Income in 1999 Below Poverty Level	10,396	3,672	55,086
Population for Whom Poverty Status was Determined	23,061	54,786	384,512
Percent with Income in 1999 Below Poverty Level	***45***	***7***	***14***

Source: U.S. Census Bureau 2000.

below the poverty level in 1999. Due to the wide discrepancy between the number of residents below the poverty level within the study area and the number in the surrounding communities', further analysis regarding the study area was conducted.

Census tracts 29.02, 29.12, and 29.11 are directly adjacent to UCSB, in an area commonly referred to as "Isla Vista." UCSB has an average enrollment of 19,600 students, including approximately 2,600 graduate students, the vast majority of which live within the Isla Vista area (CSLC 2006). University students tend to be younger than the general population, which is represented by the fact that approximately 90 percent of the population in Census Tract 29.11 is between the ages of 18 and 24. The median age in this census tract is 20.9 years. Likewise, census tracts 29.02, 290.03, and 29.12 have approximately 71 percent, 76 percent, and 72 percent of their respective populations between the ages of 18 and 24. The median age in these census tracts is 21.4, 19.9, and 21.2 years, respectively. In contrast, the percentage of Santa Barbara County residents between the ages of 18 and 24 is 13 percent and the median age is 33.4 years while Goleta has approximately 9 percent of the population between the ages of 18 and 24, and the median age is 38.2 years (U.S. Census Bureau 2000).

In addition to being younger than the general population, university students tend to have less income due to the time-consuming nature of their studies. Therefore, in the census tracts with the highest percentage of population between the ages of 18 and 24, the percentage of those who had income in 1999 below the poverty level was also high.

4.15.3 Significance Criteria

An environmental justice impact would be considered significant if the proposed Project would:

- Have the potential to disproportionately impact minority and/or low-income populations at levels exceeding the corresponding medians for the County in which the Project is located; or

- Result in a substantial, disproportionate decrease in the employment and economic base of minority and/or low-income populations residing in the County and/or immediately surrounding cities.

4.15.4 Impact Analysis and Mitigation

Impact Discussion

As discussed in Section 4.2, Safety and Section 4.5, Hydrology, Water Resources, and Water Quality, construction and operation of the proposed Project would increase the risk for a crude oil spill which would expose people located in the vicinity of the Project area to potential health, safety, and economic impacts. However, the proposed Project is located 0.6 miles from the nearest residence and 0.8 miles from the nearest school. People with the greatest potential to be impacted by the proposed Project are users of Sandpiper Golf Course and recreational beach users. The golf course is located approximately 200 feet away from Piers 421-1 and 421-2 and at an elevation of about 50 feet higher. The 6-inch pipeline traverses the golf course near the 12th tee and leaks at that point represent the only real hazard to golfers. The beach near PRC 421 is used much less often than other beaches in the area as the adjacent beach is ephemeral with sand present only part of the year. Further, the nearest beach access is approximately 0.5 miles in either direction, at the Bacara Resort and beneath Ellwood Mesa. Potential users of the adjacent beach could come from any ethnicity or income level. In contrast, users of Sandpiper Golf Course are more likely to be comprised of upper-middle and upper-class income levels. Therefore, construction and operation of the proposed Project would not disproportionately impact minority or low-income populations or result in a substantial disproportionate decrease in the employment and economic base of minority and/or low-income populations in the area.

Impact EJ-1: Impacts to Minority and/or Low-Income Populations

The Project would cause an increase in the production and transportation of crude oil which could affect minority and/or low-income populations (Significant, Class I).

Impact Discussion

The proposed Project would increase production of oil off the Ellwood coast and throughput of oil at the EMT and barge Jovalan, thus increasing the likelihood of an accidental release of crude oil to the marine environment. Analyses of risk presented in Section 4.2, Safety, indicate the possibility of a release of crude oil into the marine environment. Also, increased production above current levels would increase the

frequency, though not the volume, of potential crude oil spills due to an increase in barge trips and in the annual operating hours of the loading pipeline (as discussed in Section 4.2, Safety). As discussed in Section 4.5, Hydrology and Water Quality, a potential large spill would most likely head east towards Devereux Slough. Devereux Slough is located adjacent to Isla Vista, an area comprised primarily of lower-income college student. A large spill would potentially significantly impact recreational opportunities and visual resources for the residents of Isla Vista. In addition, potential malodor and air quality impacts would disproportionately affect the coastal residents in this town compared to the general population of Goleta and Santa Barbara County. Therefore, a large crude oil spill could potentially disproportionately impact low-income populations of Isla Vista and is considered a significant and unavoidable impact (Class I).

Mitigation Measures

Implementation of MMs identified in Sections 4.2, Safety, 4.3, Hazardous Material, and 4.5, Hydrology, Water Resources, and Water Quality for contingency planning and spill response would be required.

Rationale for Mitigation

The measures presented in the above-mentioned sections provide improved oil spill response capabilities, oil spill containment measures, and protection of resources. With implementation of those measures, the health risk to low-income populations in Isla Vista may be reduced.

Residual Impacts

Because there are limitations to thorough containment and cleanup of an offshore oil spill, and recovery from an oil spill would take an undetermined length of time, impacts environmental justice impacts to the low-income populations of Isla Vista are considered significant following mitigation.

Impacts Related to Future Transportation Options

For the purposes of this analysis, it is assumed that Line 96 and the EMT would be used to transport crude oil recovered from PRC 421 using the barge Jovalan to ship the oil to a Los Angeles or San Francisco Bay area refinery through approximately the year 2013. However, as discussed earlier in this EIR (Sections 1.2.4, 2.4.2, and 3.3.6), several options exist for future transportation of oil from the Project, each with different potential impacts to marine biological resources. These include ongoing use of the

EMT through 2013, use of a pipeline to Las Flores Canyon, and trucking of oil to Venoco's ROSF Facility 35 miles to the south and subsequent transport to Los Angeles via pipeline. The potential environmental justice impacts from transportation using the existing EMT system are fully described above (Impact EJ-1).

However, because the timing and exact mode of transportation of produced oil after the initial five years of Project operation are speculative at this point in time, the potential impacts of use of a pipeline or trucking are fully disclosed as part of the alternatives analysis (Section 4.15.5). If neither option is permitted nor available by the cessation of operation of the EMT, production from PRC 421 would be stranded, at least temporarily, until an alternative transportation mode is approved and becomes available.

Table 4.15-2. Summary of Environmental Justice Impacts and Mitigation Measures

Impact	Mitigation Measures
EJ-1: Impacts to Minority and/or Low-Income Populations	Implementation of MMs identified in Sections 4.2, Safety, 4.3 Hazardous Material, and 4.5 Hydrology, Water Resources, and Water Quality.

4.15.5 Impacts of Alternatives

No Project Alternative

Under the No Project Alternative, Venoco would not recommission PRC 421, the wells would be shut-in, and existing infrastructure would be subsequently decommissioned. Minor petroleum releases could occur during the dismantling of the existing infrastructure at PRC 421, however the potential for a large oil spill from the piers would be less than under the proposed Project and associated air, water quality, safety, and hazardous material impacts would be reduced. Consequently, the potential risks to beach users and golfers would be reduced; therefore, no environmental justice impacts would occur upon implementation of the No Project Alternative.

As noted in Section 2.1.1, the CSLC has concerns about the potential for pressure to build up in the reservoir, causing oil to escape from wells that were abandoned in the 1940s and 1950s. This concern is based on observations following the 1994 shut-in of the PRC 421 wells. The potential for unquantified and uncontrolled releases from previously abandoned wells is of concern, particularly because the releases would directly impact marine waters and coastal habitats. Based upon the thresholds identified in this EIR, any such release of oil into the environment could create potentially significant impacts to affected marine biological resources similar to those

identified in Impact EJ-1. However, insufficient data exist to quantify the actual potential for such leaks to occur, their exact location or the size of such leaks; therefore it would be speculative to identify either the frequency or potential severity of such impacts at this time.

No Project Alternative with Pressure Testing

Under this Alternative, Venoco would conduct pressure testing at PRC 421 for a period of 6 to 12 months prior to decommissioning the wells. Pressure testing would entail the installation of a 2-inch flowline connecting PRC 421 to the EOF. All processing and separation of the produced oil and water would be completed at the EOF. Therefore, the potential for an oil spill from the piers is reduced and associated air, water quality, safety, and hazardous material impacts would be reduced. Consequently, the potential risk to beach users and other recreationalists in the vicinity of PRC 421 would be reduced. Further, since beach users and occupants of Sandpiper Golf Course are comprised of a variety of income-levels and ethnicities, this Alternative would not disproportionately impact minority and/or low-income populations or result in a substantial disproportionate decrease in the employment and economic base of minority and/or low-income populations in the area. Therefore, this Alternative would have a less than significant environmental justice impact.

Onshore Separation at the EOF

Under this Alternative, oil produced at PRC 421 would be processed onshore at EOF. This Alternative would require installation of many of the same supporting infrastructure improvements and associated construction-related activities as the proposed Project. Similar to the No Project Alternative, the potential for an oil spill from the wells at PRC 421 would be reduced; therefore, the associated potential safety and water quality impacts to beach users and golfers would be reduced. Beach users who commonly use the beach areas are comprised of a variety of income-levels and ethnicities, and golfers who typically use Sandpiper Golf Course are comprised primarily of individuals with upper-middle class and upper-class incomes. However, like the proposed Project, this Alternative could result in large oil spills that could impact minority or low income residents in Isla Vista. Therefore, this Alternative would result in similar, though slightly reduced environmental justice impacts as described in the proposed Project.

Recommissioning Using Historic Production Methods

Under this Alternative, production of oil at PRC 421 would resume using historic production methods, including a gas-powered internal combustion engine and an

above-ground pump. Similar to the proposed Project, implementation of this Alternative would increase the risk of exposure of beach users and golfers to a crude oil spill, diesel spill, or fire. Since beach users who commonly use the beach areas are comprised of a variety of income-levels and ethnicities, and golfers who typically use Sandpiper Golf Course are comprised primarily of individuals with upper-middle class and upper-class incomes, this risk would not disproportionately impact minority or low-income populations. However, like the proposed Project, this Alternative could result in large oil spills that could impact minority or low income residents in Isla Vista. Therefore, this Alternative would result in similar environmental justice impacts as described in the proposed Project.

Re-injection at Platform Holly

Under this Alternative produced water would be transported via pipeline to Platform Holly and re-injected offshore. All other aspects of the proposed Project would remain the same. Therefore, this Alternative could result in large oil spills that could impact minority and low-income residents in Isla Vista.

Transportation Sub-Alternative Options

Pipeline Sub-Alternative

This method of crude oil transportation would involve the construction of an onshore 6-inch-diameter crude-oil pipeline from the EOF to the AAPL at Las Flores Canyon. The proposed pipeline would cross under Highway 101 near the EOF and run parallel to the north side of the highway for approximately 8.5 miles to Las Flores Canyon. At Las Flores Canyon, the pipeline would run a short distance up the canyon to the AAPL pipeline pump station that is located at the ExxonMobil SYU oil and gas processing facility. The Venoco Pipeline would tie in directly to the AAPL and would not utilize any of the ExxonMobil SYU storage tanks. The pipeline would be installed along Calle Real, parallel to and north of Highway 101. Since Calle Real does not run the entire length of the proposed pipeline route, the pipeline would also cross a few stretches of private ranch/agricultural roads that parallel Highway 101.

This Alternative would not disproportionately impact minority and/or low-income populations or result in a substantial disproportionate decrease in the employment and economic base of minority and/or low-income populations in the area. Therefore, this Alternative would not have an environmental justice impact.

Trucking Sub-Alternative

Under this Alternative, crude produced at Well 421-2 would be transported by truck as opposed to Barge Jovalan. Trucks from the EOF would access Highway 101 at the Hollister Avenue onramp and travel east for approximately 32 miles to the Seacliff exit. The trucks would exit the highway at Seacliff and travel along Highway 1 to the ROSF access road. The total one-way distance would be approximately 35 miles. This method of transportation could disproportionately impact minority and/or low-income populations due to truck travel near neighborhoods with a disproportionately high percentage of these populations; however, it would not result in a substantial disproportionate decrease in the employment and economic base of minority and/or low-income populations in the area. Therefore, this method of transportation could have an adverse but not significant environmental justice impact.

4.15.6 Cumulative Projects Impact Analysis

The cumulative projects identified in Section 3.0, Alternatives and Cumulative Projects, primarily affect residents of south Santa Barbara County, the city of Goleta, and coastal areas from the San Francisco Bay Area to Los Angeles. People from every ethnicity and income level would be included in the potentially affected area. Significant impacts from some of these projects may be found to have a disproportionate effect on a minority or low-income population.

Significant cumulative Project impacts associated with marine spills would affect resources used by many different people, regardless of ethnicity or income, and would therefore not have a disproportionate impact over that expected by the proposed Project (Impact EJ-1) on a minority or low-income population.